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August 28, 2002

VIA HAND DELIVERY

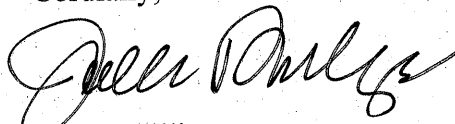
The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Proposed Rules for the Provisioning of Tariff Term Plans and Special Contracts*
Docket No. 00-00702

Dear Chairman Kyle:

Enclosed herein for filing, please find the original and fourteen copies of a Joint Statement in Response to the Notice of Filing and Pre-Hearing Conference. Copies of the enclosed are being provided to counsel of record for all parties. The parties would be available to discuss their joint filing by conference call, if needed, prior to the Pre-Hearing Conference on September 9th.

Cordially,



Joelle Phillips

JP/jej

Enclosure

cc: The Honorable Deborah Tate, Hearing Officer

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Tennessee Regulatory Authority
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BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: ***Proposed Rules for the Provisioning of Tariff Term Plans and Special Contracts***

Docket No. 00-00702

JOINT STATEMENT IN RESPONSE TO THE NOTICE OF FILING
AND PRE-HEARING CONFERENCE

BellSouth Telecommunications, Inc. ("BellSouth"), the Attorney General Office Through the Consumer Advocate and Protection Division ("the Consumer Advocate"), Time Warner, AT&T and SECCA (collectively "the Parties"), provide this Joint Statement in Response to the Notice of Filing and Pre-Hearing Conference issued by the Hearing Officer on August 21, 2002 in the above-referenced docket. The Parties respectfully show the Hearing Officer as follows.

The Parties have met to discuss a mutually acceptable schedule for addressing issues in this docket. In the course of those discussions, the Parties have also discussed the prospect of settlement negotiations in an attempt to resolve or narrow the issues before the TRA in this docket. As a result of those discussions, the Parties believe that a period of time, during which the Parties could conduct a series of confidential settlement negotiations would be fruitful. Moreover, the Parties fear that, in contrast, a schedule requiring the Parties to conduct discovery and file testimony in order to be prepared for hearing the week of September 30th would be likely to polarize the Parties and may be plagued by significant discovery disputes.

Accordingly, the Parties propose the following:

I. Confidential Settlement Meetings.

The Parties propose that a series of confidential settlement meetings proceed commencing immediately and concluding by October 15, 2002. The Parties would then report to the TRA by Monday, October 21, 2002 at 4:30 p.m. whether those settlement meetings have resulted in any

joint proposal or negotiated compromise addressing the issues presented to the TRA in this docket. In the event that issues remain outstanding in this docket, the Parties would be prepared at that point to proceed with the following schedule.

II. Hearing Schedule.

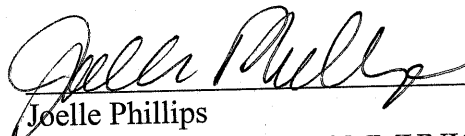
- A. Each party's proposed list of criteria for consideration of CSAs would be filed on October 21, 2002, by 4:30 p.m.;
- B. Discovery requests would be issued on Tuesday, October 22, 2002;
- C. Responses to discovery requests would be served on Monday, November 4, 2002;
- D. Direct testimony would be filed on Friday, November 22, 2002;
- E. Rebuttal testimony would be filed on Tuesday, December 3, 2002; and
- F. A hearing would be conducted during the week of December 9, 2002.

The Parties believe that their efforts through settlement negotiations may resolve the issues in this docket or significantly narrow them. In contrast, a schedule which would require the Parties to immediately move toward formulating their positions in the form of testimony and discovery responses may serve only to entrench the Parties in their current positions. For these reasons, the Parties respectfully urge the Authority to adopt the schedule proposed above in order to provide the Parties with time to work toward a negotiated resolution while, at the same time, ensuring that if those efforts do not prove fruitful, then the Parties will be prepared to move expeditiously toward a resolution through the hearing process at the TRA.

BellSouth and the Consumer Advocate Division agree and propose that, during the period for settlement negotiations, the schedule following, and until such time as the TRA enters an order regarding this matter, CSAs submitted for approval by BellSouth continue to be treated pursuant to the arrangement proposed by BellSouth and the Consumer Advocate Division. Specifically, such agreements should be permitted to go into effect pending the outcome of this docket, a TRA-

approved notification letter be provided to the customers affected, and ultimate approval of the CSAs will be subject to further review by the TRA. Time Warner, AT&T and SECCA take no position regarding this proposal at this time.

Respectfully submitted,



Joelle Phillips

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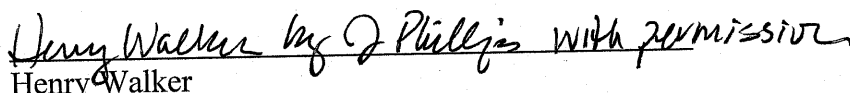
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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2002, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☒ Mail
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☐ Overnight

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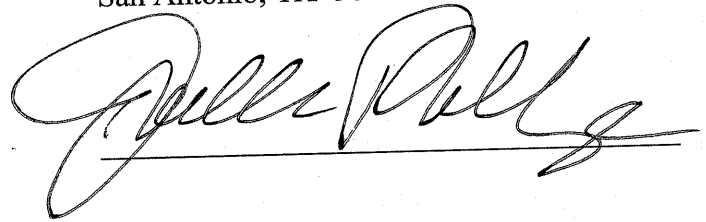
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A handwritten signature in cursive script, appearing to read "Timothy Phillips", written over a horizontal line.